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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In re:

Redevelopment of Spectrum to
Encourage Innovation in the
Use of New Telecommunications
Technologies

ET Docket No. 92-9

RM-7981
RM-8004

Comments of Hughes Communications Galaxy, Inc.

Hughes Communications Galaxy, Inc. ("HCG") hereby submits these Comments in response to the Supplemental Comments of Alcatel Network Systems, Inc. ("Alcatel") filed on May 19, 1993 in this proceeding.

In its Supplemental Comments, Alcatel amended its previous channelization proposal for the 4 GHz band in attempt to synthesize its plan of January 26, 1993 with the comments of the Telecommunications Industry Association, Harris Corporation-Farion Division, Digital Microwave Corporation, and Telesciences, Inc. Among other things, Alcatel proposes to delete all narrowband channels from its 4 GHz band proposal and to allow that band to be used on a terrestrial basis only for 10 MHz and 20 MHz channels.

HCG has expressed concern throughout this proceeding about the disruption to the C band satellite industry that would result from the adoption of the Commission's proposal to rechannelize portions of the 4 GHz band and allow displaced 2 GHz

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microwave users to use that band. In particular, HCG previously has explained that the 4 GHz band channelization plan originally suggested by Alcatel, and ultimately proposed by the Commission, would create increased terrestrial interference into satellite communications.

In response, on January 26, 1993, Alcatel proposed an alternative channelization plan that would maintain the frequency "offset" that currently exists between terrestrial and satellite uses of the 4 GHz band, but still would allow the 4 GHz band to be used for narrowband channels of 5 MHz and less. Now, Alcatel proposes to further refine its proposal by excluding narrowband terrestrial channels from the 4 GHz band.

Assuming the Commission determines that it is necessary to open the 4 GHz band to displaced microwave users, HCG does not object to Alcatel's modifications to its revised channelization plan. HCG believes that this new proposal is preferable to the plan the Commission has proposed because it is more consistent with the use of this band for satellite communications.

As HCG has previously explained, HCG still remains concerned that use of the 4 GHz band is not the best solution for relocating displaced microwave users. Nothing in Alcatel's new proposal changes this concern. The 4 GHz band already is congested and use of that band by additional users (regardless of the channelization method used) will present coordination challenges for all users of the band. HCG supports Alcatel's proposals to find spectrum in bands other than 4 GHz and urges

the Commission to continue to review alternatives, such as the
3.6-3.7 GHz band.

Respectfully submitted,

HUGHES COMMUNICATIONS GALAXY, INC.

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June 14, 1993

CERTIFICATE OF SERVICE

I, John P. Janka, do hereby certify that the attached
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